

Exhibit "D"

PLAINTIFF COUNSEL'S CERTIFICATE OF GOOD FAITH

Comes now, Plaintiff Counsel member, Joel L. DiLorenzo, and certifies to this Honorable Court that I have made all reasonable good faith efforts to reach an agreement with opposing counsel, Counsel for Defendant Takata Corporation, pertaining to the issue of Plaintiff's request to propound additional written interrogatories as set forth in detail in Plaintiff's Renewed Motion to Propound Additional Written Interrogatories to Defendants. However, I have been unable to reach an agreement with Counsel for Defendant Takata regarding same.



Joel L. DiLorenzo, Esq.